

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

\* Jason Reed Farmer  
Lexington County Sheriff's Dept  
Lexington County Detention Center  
Lexington CO, LCDC Medical Dept.

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**Complaint for Violation of Civil Rights**  
(Prisoner Complaint)

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No  
(check one)

-against-

\* Lexington CO Sheriff Dept  
Lexington CO Detention Center  
LCDC Medical Dept, and Security Dept.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

When submitted for filing, your complaint should be accompanied by the full filing fee or an application to proceed in *forma pauperis*.

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Jason Reed Farmer

All other names by which you have been known:

ID Number

159654

Current Institution

Lexington County Detention center

Address

521 Gibson Rd Lexington SC  
29071

\*B.

## The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

## Defendant No. 1

Name

Jay Koon

Job or Title  
(if known)

Sheriff of Lexington Co.

Shield Number

Employer

Lexington Co. State of SC

Address

521 Gibson Rd Lexington  
SC 29071

☐ Individual capacity

☒ Official capacity

## Defendant No. 2

Name

LT. Clausen

Job or Title  
(if known)

Commanding officer under major  
Jones over maintenance & medical

Shield Number

Employer

Address

Lex. Co./or state of SC  
521 Gibson Rd Lexington  
SC 29071

☐ Individual capacity

☒ Official capacity

Defendant No. 3

Name

Major Jones

Job or Title  
(if known)

Warden of the Jail or commanding  
officer to my knowledge

Shield Number

Employer

Address

Lex. Co./or state of SC  
521 Gibson Rd Lexington  
SC 29071

☐ Individual capacity

☒ Official capacity

Defendant No. 4

Name

LCDC & All Security & medical staff  
Security officers & Dr.'s & nurses at LCDC

Job or Title  
(if known)

Shield Number

Employer

Address

Lex. Co./or state of SC  
521 Gibson Rd Lexington  
SC 29071

☐ Individual capacity

☒ Official capacity

## II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

\* B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

My right to proper medical treatment and neglect of my medical needs which lead to further injury and improper healing of a gun shot to the head & a broken neck

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\* D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

severely neglected after arriving at this facility with a gun shot to the head & a broken neck. After a few days after arriving here At LCDC I started having issues. →

### III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

☒ Pretrial detainee

☐ Civilly committed detainee

☐ Immigration detainee

- ( ) Convicted and sentenced state prisoner  
 ( ) Convicted and sentenced federal prisoner  
 ( ) Other (explain) \_\_\_\_\_

#### \*IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

The night I was shot was not in this institution but all falls and further injury was while here in LCDC Lexington Detention Center  
 county

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

AT LCDC on the First floor RM #7 between 7/16/16 to 10/1/16 current day is ongoing issue at Lexington Detention Center  
 county

- C. What date and approximate time did the events giving rise to your claim(s) occur?

From 7/16/16 to 10/1/16 ← where injuries and falls occurred still being neglected to this day  
~~12/13/16~~ 12/13/16

- \*D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

I was neglected and abused see my statement of claim all security & medical staff at Lexington Detention Center The officers & nurses saw this happen but I'm sure will lie to cover their selves just as they lied to my family who called and was told I was fine that nothing was happening to me which was a lie I have lots of inmates names who were housed with or next to me who saw and heard these things happen



Witnesses → Alex Terman Wallace, Tyrell Shaw, Joshua Murray, Keedartbi, Justin Aldridge, Robert Doss, Shawn Howard, Joseph Thomas, John Argo, Keith Anderson, Charles Belk Owen Avants, ~~Mark~~ <sup>Mike</sup> Henry - All saw me at one time or another hurt or being neglected or abused

\*V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

I had a broken neck and a bullet in my brain when the falls started. I now have nerve damage and other neurological issues from the falls. Not to mention the blurred vision, balance problems and muscle weakness and coordination problems. After I was falling for over a month they finally gave me something for dizziness and a wheelchair but the damage is done already - Oh and my neck is healing crooked from the falls and my collar being broke for so long

\*VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I would like all future medical bills for these injuries to be paid by the defendants & money damages of ~~1 million~~ 1 million dollars. I will never be able to work a normal job again & at 31 yrs old this facility's & staff's neglect has forever changed my life mentally and physically for the rest of my life. I will suffer for what they have done

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Lexington County Detention Center

- B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

- C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☐ No

☒ Do not know

If yes, which claim(s)?

My grievances were about things well within the control of this facility so they should be Grievable offenses

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

E. If you did file a grievance:

1. Where did you file the grievance?

At Lexington Co. Detention Center  
& Lexington Sheriff's Dept

2. What did you claim in your grievance?

That I was not receiving the proper medical care and that I was being neglected & abused

3. What was the result, if any?

No result. In one I was told it was not a grievable offense the rest were signed by shift supervisors but not responded to. I have copies of grievances

\*4.

What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

Inmate I have done the entire process from request form to grievance to medical forms then grievances and grievances about the grievances not being answered that's as high as we as inmates are allowed to go. I have done all I can do as an inmate and have been ignored & neglected every step of the way



F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

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2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

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\*G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

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*(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)*

#### VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes  
☒ No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

\_\_\_\_\_

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court *(if federal court, name the district; if state court, name the county and State)*

\_\_\_\_\_

3. Docket or index number

\_\_\_\_\_

4. Name of Judge assigned to your case

\_\_\_\_\_

5. Approximate date of filing lawsuit

\_\_\_\_\_

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

\_\_\_\_\_

\_\_\_\_\_

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☒ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court *(if federal court, name the district; if state court, name the county and State)*

\_\_\_\_\_

\_\_\_\_\_

3. Docket or index number

\_\_\_\_\_

4. Name of Judge assigned to your case

\_\_\_\_\_

5. Approximate date of filing lawsuit

\_\_\_\_\_

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)  
\_\_\_\_\_  
\_\_\_\_\_

#### IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

##### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: DEC. 9th, 2016.

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification # 159654

Prison Address

521 Gibson Rd

lexington

City

SC.

State

29071

Zip Code

##### B. For Attorneys

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address  
Telephone Number  
E-mail Address

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